

# EXHIBIT D

IN THE DISTRICT COURT OF THE U.S. VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN

In re The Complaint and Petition of Costar Sailing, LLC, as Owner, and J&J Yacht Services, LLC, as Owner Pro Hac Vice/Operator, of The S/V Carpe Aura, Hull #: FPA54253I819 and Official No. 1291579.

Case No. 3:21-cv-059

Jury Trial Demanded

Edward and Cindy Morea,

Claimants and Third-Party Plaintiffs,

v.

Atlantic Cruising Yachts, LLC Fountain Pajot, SA and Constantine Bakas,

Third-Party Defendants.

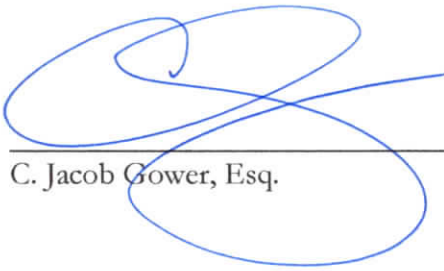
**AFFIDAVIT OF C. JACOB GOWER, ESQ. IN SUPPORT OF  
PETITION FOR PRO HAC VICE ADMISSION OF DAVID A. SAFRANEK, ESQ.**

The undersigned, C. Jacob Gower, Esq., being duly sworn according to law upon his oath does hereby depose and state as follows:

1. I am an adult citizen of the United States of America and am a duly admitted member of the Virgin Islands Bar in good standing, VI Bar No. R2103.
2. I hereby move for the admission of David A. Safraneck, *Pro Hac Vice*, in the above captioned matter to act as counsel to Constantine Bakas.
3. The purpose of this motion is to permit David A. Safraneck to serve as additional counsel with me to prepare the defense of Constantine Bakas.
4. For the foregoing reasons and as set forth in David A. Safraneck's application for *Pro Hac Vice*, I respectfully request his admission to be permitted.

I declare under penalty of perjury that the foregoing is true and correct.

This 7<sup>th</sup> day of August, 2023.

  
C. Jacob Gower, Esq.

Subscribed and Sworn to before  
me this 7<sup>th</sup> day of August 2023.

  
Notary Public



HARRY RICHARD YELTON  
Notary Public  
Notary ID No. 156864  
MY COMMISSION IS FOR LIFE